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February 20, 2019

Solomon v. Fordham University
Case No. 18-cv-04615 (ER)

Dear Judge Ramos:

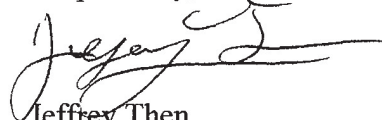
I write with respect to the Notices of Limited Appearance of Pro Bono Counsel submitted by Cravath, Swaine & Moore LLP (“Cravath”), on behalf of Plaintiff Dr. Esther Solomon in the above-referenced matter (“Matter”).

On December 7, 2018, attorneys with Cravath filed Notices of Limited Appearance of Pro Bono Counsel for the limited purpose of assisting Dr. Solomon with fact discovery in the Matter. (*See* Dkt. 17, Dkt. 18.) At the initial Court conference on December 13, 2018 (“Conference”), the Court ordered the parties to begin discovery pursuant to a Case Management and Scheduling Order (*see* Dkt. 20), as well as to undergo Court-ordered mediation pursuant to a Mediation Referral Order (*see* Dkt. 19) (“Mediation”). Following the Conference, Cravath amended its engagement letter with Dr. Solomon to provide that Cravath’s representation of Dr. Solomon includes the Mediation. Consistent with that amendment, we file with this letter Amended Notices of Limited Appearance of Pro Bono Counsel (“Amended Notices”).

Pursuant to the Amended Notices, Cravath will assist Dr. Solomon with fact discovery pertaining to the allegations in her May 24, 2018 Complaint (Dkt. 1)—specifically, serving and responding to Requests for Production of Documents, Interrogatories and Requests for Admission; taking and defending depositions; filing or responding to any discovery-related motions (*e.g.*, motions to compel production of documents); and appearing at any Court conferences with respect to the aforementioned discovery topics—as well as represent Dr. Solomon at the Mediation. For the sake of clarity, Cravath’s limited representation does not currently include dispositive motions, expert discovery, trial, appeals or any amended pleadings.

We are available to discuss should the Court have any questions or require any additional information.

Respectfully,



Jeffrey Then

Hon. Edgardo Ramos
United States District Judge
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VIA ECF

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